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January 11, 2002

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Docket No. 97-00409: All Telephone Companies Tariff Filings  
Regarding Reclassification of Pay Telephone Service  
UTSE Response to TPOA Discovery

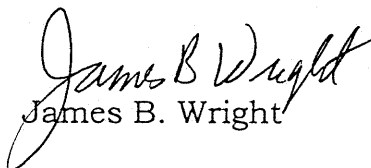
Dear Mr. Waddell:

Enclosed for filing are an original and thirteen copies of United Telephone-Southeast, Inc.'s Response to the Third Set of Data Requests from the Tennessee Payphone Owners Association.

A copy of the Response is being served on counsel of record. Please note that certain of the information has been designated proprietary and as such is subject to the Protective Order entered in this Case.

Please contact me if you have any questions.

Sincerely,

  
James B. Wright

cc: Counsel of Record (with enclosure)  
Laura Sykora  
Kaye Odum  
Whitney Malone

CERTIFICATE OF SERVICE; DOCKET 97-00409  
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that a copy of the foregoing Response to Discovery was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

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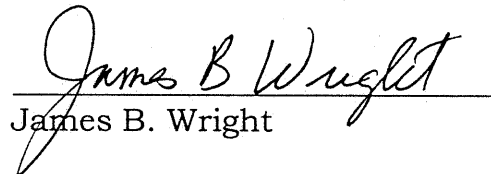
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January 11, 2002

  
James B. Wright

**TENNESSEE REGULATORY AUTHORITY, DOCKET NO 97-00409  
THIRD SET OF DATA REQUESTS DATED DECEMBER 28, 2001 FROM  
TENNESSEE PAYPHONE OWNERS' ASSOCIATION TO  
UNITED TELEPHONE-SOUTHEAST, INC.**

Question 1. Refer to Sprint's response to 1a. Explain in detail why a change in the reported loop length has no impact on the investment in, or cost of, payphone loops.

Answer: The geocoding of payphone locations was completed prior to processing the Sprint Loop Cost Model (SLCM). Investment and loop length were then calculated during the processing of the SLCM. The error regarding loop length averages referred to in Sprint's answer to Question 1(a) of the TPOA's Second Data Request occurred in the loop length average summary sheet calculation that was based upon correct SLCM data. The error was not in the geocoding process or the cost determination.

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Question 2. Refer to Sprint's response to 1b, pages 2-16.

- a. Provide a functioning electronic copy of this worksheet.
- b. Provide the correct entries (for all rows) for the column entitled "Payphones per Grid," if only PTAS, rather than all payphone, lines are counted.

Answer:

- a. A functioning electronic copy of the specified worksheet Sprint provided in answer to Question 1(b) of the TPOA's Second Data Request is being provided to the TPOA counsel via email.
- b. Sprint's response to Question 1(b) of the TPOA's Second Data Request answered for all payphones within Sprint's Tennessee local service area regardless of affiliation. Sprint has no basis upon which to distinguish "payphone lines" from "PTAS lines". There is no industry standard to refer to generally nor have specific definitions been provided by the TPOA in any data request. In fact, Sprint's answer to Question 6 of the TPOA's Second Data Request specifically stated that the terms "payphone" and "PTAS" are used interchangeably in Sprint's studies.

To the extent the TPOA is assuming that "PTAS" should be read to mean a subset of all payphones lines within Sprint's local service area regardless of affiliation, Sprint answers that this information does not readily exist in the requested format. This is true whether the TPOA defines PTAS to include all TPOA member payphone lines or just those TPOA members represented by counsel in this proceeding.

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Question 3. Refer to Sprint's response to 3b.

- a. Identify and describe the "billing database" used to compile the list of "current payphone addresses."
- b. Extract from this same database a list of current addresses for *PTAS lines only*, and provide the resulting information in the same format as the attachment to 3a.
- c. If Sprint contends that the billing database identified in response to part a of this request cannot be used to compile a list of addresses for PTAS lines, describe in detail the limitations of the database that make the extraction of such information impossible.
- d. Using the information developed in response to part b of this request, use the MapMarker software to create a map, in the same format as the attachment to Sprint's response to 3a, showing PTAS locations only.
- e. For each address in the list developed in response to part b of this request, provide the correct FDI code. For purposes of this request, the term "FDI code" is intended to have the same meaning as the title of the column entitled "FDI Code" on pages 2-16 of Sprint's attachment to 1b.

Answer:

- a. The Customer Records and Billing or CRB system provides a general ledger function and is at the center of Sprint's business systems. CRB is a fully integrated system which provides for the billing of end user customers and contains physical location addresses. CRB provides the uniform billing module for all Sprint LTD companies and facilitates the recording and updating of all customer bills.
- b. Sprint has no basis upon which to distinguish "payphone lines" from "PTAS lines". There is no industry standard to refer to generally nor have specific definitions been provided by the TPOA in any data request. In fact, Sprint's answer to Question 6 of the TPOA's Second Data Request specifically stated that the terms "payphone" and "PTAS" are used interchangeably in Sprint's studies.

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Answer to Question 3b continued.

To the extent the TPOA is assuming that "PTAS" should be read to mean a subset of all payphones lines within Sprint's local service area regardless of affiliation, Sprint answers that this information does not readily exist in the requested format. This is true whether the TPOA defines PTAS to include all TPOA member payphone lines or just those TPOA members represented by counsel in this proceeding.

- c. See Sprint's answer to Question 3(b) of this data request.
- d. See Sprint's answer to Question 3(b) of this data request.
- e. See Sprint's answer to Question 3(b) of this data request.

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Question 4. Refer to Sprint's response to 2a.

- a. Is it Sprint's position that the difference in the values in the "USF ROR 5/1/2001 Filing" and the "USF ROR Geocoded" column is completely explained by the use of "geocoded payphone service locations"?
- b. If the answer to part a of this request is yes, explain in detail why the use of shorter average loop lengths resulted in an increase in the average investment per loop.
- c. If the answer to part a of this request is anything other than an unqualified yes, describe in detail all changes in methodology, assumptions, inputs, or other data that cause the reported values in these columns to be different. For each listed change, describe in detail why the change was made and provide all workpapers or other supporting documentation.

Answer:

- a. No. The differences between the studies (the two October 10, 2001 studies versus the May 1, 2001 study) are explained in Sprint's response to Question 2(a) of the TPOA's Second Set of Data Requests.
- b. The answer to Question 4(a) was "No."
- c. See Sprint's answer to Question 2(c) of the TPOA's Second Data Request. The answer was further supplemented by Sprint on January 11, 2002 in response to the TPOA's December 28, 2001 Motion to Compel.